

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Thomas Charles Felton Jones,)	
)	
Plaintiff,)	PLAINTIFF'S ANSWERS TO LOCAL
)	RULE 26.01 INTERROGATORIES
vs.)	
)	C.A. No.: _____
Deputy Jonathan Cooper, Deputy James)	
Berggrun, Deputy Charles Lancaster,)	
Deputy John Thomas Edwards, and)	
Sergeant Michael Kastner,)	
)	
Defendants.)	

Plaintiff submits the following answers to Local Rule 26.01 interrogatories:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

The Plaintiff has not been provided with notice of any persons or legal entities who may have a subrogation interest.

B. As to each claim, state whether it should be tried jury or nonjury and why.

All claims should be tried by a jury because the Plaintiff has demanded a trial by jury and the claims are triable by a jury.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

The Plaintiff is not a publicly owned company, nor is he a subsidiary, partner, or affiliate of a public owned company, nor is he owned by a publicly owned company, nor does he own 10% or more of the outstanding shares of a publicly owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

This is the division that embraces Greenville County, where a substantial portion of the acts or

omissions are alleged to have occurred.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Court of court based on a determination of whether the cases; arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judge?

The action is not related in whole or in part to any other matter filed in this District.

July 21, 2021

/s/ Kyle J. White

Kyle White (Fed. Bar No. 11774)

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